



COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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November 20, 2001

SENT VIA EMAIL AND U.S. MAIL

Karlen J. Reed
Joseph W. Rogers
Wilner Borgella, Jr.
Assistant Attorneys General
Regulated Industries Division
Office of the Attorney General
200 Portland Street, 4th Floor
Boston, MA 02114

Re: D.T.E. 01-31-Phase I
D.T.E.'s First Set of Information Requests to the Attorney General

Dear Ms. Reed and Messrs. Rogers and Borgella:

Enclosed please find the first set of questions to the Attorney General for the Commonwealth of Massachusetts issued by the Department in the above-captioned matter. Please submit the Attorney General's response to the Department and the participants in hard copy and by email on or before 5:00 p.m., Friday, November 30, 2001. Should you have any questions, please contact me at (617) 305-3608.

Sincerely,

/s/

Paula Foley
Hearing Officer

Encs.

cc: D.T.E. 01-31 service list (w/encs.)

INSTRUCTIONS FOR RESPONSES TO INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to the Attorney General the following Information Requests.

Instructions

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punched page with a recitation of the request, a reference to the request number, the docket number and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in the broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, and on all Department staff and parties; and submit two (2) copies of the responses to Paula Foley, Hearing Officer.

**QUESTION TO THE ATTORNEY GENERAL OF
THE COMMONWEALTH OF MASSACHUSETTS**

D.T.E. 01-31-Phase I

November 20, 2001

Question Based upon Lee Selwyn's Direct Testimony

1. See p. 24, lines 1-3: Please provide all documents and sources relied upon in support of Dr. Selwyn's statement, "All else being equal, customers are less likely to accept a telephone number in an unfamiliar area code even for a somewhat lower monthly price."